

**EXHIBIT "B"**

**Proposed Order Pursuant to Federal Rules of Bankruptcy  
Procedure 2004 Compelling an Examination and Production of Documents**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IN RE:**

**MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.***

**CHAPTER 11  
CASE NO. 09-50026 (REG)  
(Jointly Administered)**

**Debtors.**

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**ORDER PURSUANT TO FEDERAL RULES OF BANKRUPTCY PROCEDURE  
2004 COMPELLING AN EXAMINATION AND PRODUCTION OF DOCUMENTS**

**TO: THE HONORABLE ROBERT E. GERBER,  
UNITED STATES BANKRUPTCY JUDGE**

Upon the Motion of The Schaefer Group Inc., ("*Schaefer*") for entry of an Order permitting Schaefer to conduct a 2004 Examination of individuals designated by the Debtor and believed to have knowledge of the relevant matters, as set forth herein, pursuant to Rules 4004 and 9014 of the Federal Rules of Bankruptcy Procedure (the "*Bankruptcy Rules*") and applicable Local Bankruptcy Rules;, and notice of the Motion having been given to all parties required to receive such notice, and no other or further notice being required and sufficient cause appearing therefore; it is hereby

**ORDERED** that Schaefer is hereby authorized to issue a subpoena or other process to compel the production of documents identified in Schedule 1 attached hereto, and Debtors are directed to comply with that subpoena by producing all non-privileged responsive documents described in Schedule 1 no later than thirty (30) days from the date of any subpoena issued under this Order, by delivering same via overnight courier to Susan R. Katzoff, Esq., Hiscock & Barclay, LLP, One Park Place, 300 South State Street, Syracuse, New York 13202; and it is further

**ORDERED** that the Debtor is directed to provide a privilege log in accordance with Rule 7026 of the Federal Rules of Bankruptcy Procedure, for any documents withheld from production on

account of a privilege, by delivering same via overnight courier to Susan R. Katzoff, Esq., Hiscock & Barclay, LLP, One Park Place, 300 South State Street, Syracuse, New York 13202; and it is further

**ORDERED** that Schaefer is hereby authorized to issue subpoenas compelling oral examinations under oath of each individual designated by and/or within control of the Debtor and believed to have knowledge of the matters concerning Schedule 1 hereto; and it is further

**ORDERED** that any and all subpoenas issued and served by Schaefer pursuant to this Order shall provide at least seven (7) days notice to the person or entity to be examined; and it is further

**ORDERED** that this Order is without prejudice to the rights of Schaefer to apply for further discovery of the Debtor, or of any other person or entity; and it is further

**ORDERED** that this court shall retain jurisdiction to resolve any issues with respect to this Order, the requested examinations, and the production of documents.

September \_\_\_\_, 2009

\_\_\_\_\_  
United States Bankruptcy Judge

HISCOCK & BARCLAY, LLP

**SCHEDULE "1"**

1. True and complete copies of any insurance agreement entered into by GM under which any person carrying on a business may be liable to satisfy part or all of a judgment which may be entered in the Litigation or to indemnify or reimburse for payments made to satisfy the judgment, including but not limited to all Worker's Compensation, Employers' Liability, General Liability, Excess and Umbrella Policies.

2. True and complete copies of all documents and records regarding any bonds, security, financing or self-insurance that was in effect on April 13, 2006 or may cover any claims made in the Litigation.

3. True and complete copies of records of any and all modifications and repairs for the Furnace maintained by GM, including, but not limited too, modifications and repairs made following Plaintiff's alleged accident on August 21, 2006.

4. True and complete copies of all grievances or complaints filed with or made to the United Auto Workers or any representative thereof, regarding GM policies and/or procedures for the use and operation of any of the Vulcan Cast Line furnaces at the GM Manufacturing Plant located in Massena, New York ("GM Massena"), including but not limited to any grievances or complaints relating to the sampling of molten materials, from 1995 to present.

5. True and complete copies of all records or documents, including but not limited to any records or documents maintained by the Master Mechanic or Plant Engineer and any plant equipment arrangement plans or layouts, regarding the location, placement, movement, replacement, and/or relocation of any of the Vulcan Cast Line furnaces at GM Massena.

6. A true and complete copy of the "Root Cause Analysis" referenced in paragraph 1.3 of the document entitled Agreement for Rebuild Murnane Building Contractors Inc. and GM dated February 11, 2005.

7. True and complete copies of all contracts, engineering and design documents between GM and Robert Wong for his work as lead engineer during the design, manufacture and installation of the Furnaces.

8. True and complete copies of all contracts, invoices, records or other documents relating to any work done on the Furnaces from 2001 to present.